

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

GEORGE DAVID SALUM, III

CASE NO. 2:05-CR-137-F

DEFENDANT'S MOTION FOR EXTENSION OF TIME

COMES NOW Defendant GEORGE DAVID SALUM, III, by and through his attorney, Julian L. McPhillips, Jr. and respectfully moves this court to grant him an extension of time in which to respond to the Government's Motion in Limine, filed herein on September 29, 2005.

A. STATEMENT OF FACTS

On September 29, 2005, the United States of America, through its attorneys, filed a Motion in Limine to exclude from evidence and argument certain matters, set forth therein.

On September 30, 2005, this Court filed an Order that the Defendant show cause in writing on or before October 7, 2005, as to why the Government's Motion in Limine should not be granted.

Trial is currently set in this matter for November 7, 2005.

B. DISCUSSION

In its Motion, the Government requested that no less than fourteen enumerated items be excluded at trial. As this Court is well aware, the stakes for the Defendant are high, and justice requires that he be given adequate time to prepare his best defense. Thus Defendant is entitled to prepare an adequate response to the Government's Motion in Limine to exclude certain items.

Specifically, the Defendant's counsel needs additional time to conduct legal research and consult with other legal professionals, some of which will not be available until the end of this week.


Trial is currently set for November 7, 2005, approximately four weeks from today. The Government would not be prejudiced by a one-week extension of time for response to its motion.

C. REQUESTED RELIEF

WHEREFORE the Defendant, George David Salum, III, requests that this Court grant a one-week extension of time in which to respond to the Government's Motion in Limine.

RESPECTFULLY SUBMITTED this 4th day of October, 2005,

GEORGE DAVID SALUM, III
Defendant

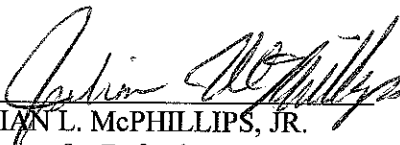

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CERTIFICATE OF SERVICE

I certify that, on this date, I have served a copy of the foregoing Defendant's Motion for Extension of Time upon the Government by electronic filing, and by mailing an additional courtesy copy of same to the Government's attorneys at the addresses below:

Dixie A. Morrow
Assistant United States Attorney
Northern District of Florida
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JULIAN L. McPHILLIPS, JR.
Attorney for Defendant